

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

LEONA FAREN,

*

Plaintiff,

*

v.

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Case No. 1:23-cv-01270-MJM

ZENIMAX ONLINE STUDIOS, LLC

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and

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AP BENEFIT ADVISORS, LLC,

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Defendants.

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**DEFENDANT ZENIMAX ONLINE STUDIOS, LLC’S
MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

Defendant ZeniMax Online Studios, LLC (“ZOS”) by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 105.9 respectfully files this Motion for Extension of Time to File A Responsive Pleading to Plaintiff Leona Faren’s (“Plaintiff”) Complaint in this action, and in support thereof states as follows:

1. Plaintiff filed her Complaint on May 14, 2023. (ECF No. 1).
2. ZOS was served with Plaintiff’s Complaint on June 16, 2023, making its responsive pleading currently due on July 5, 2023.
3. To ZOS’s knowledge, and as reflected in the Court’s docket for this action, Defendant AP Benefit Advisors, LLC (“AP”) has not yet been served.
4. On June 20, 2023, undersigned counsel emailed Plaintiff’s counsel, seeking her consent for a thirty (30) day extension to file a responsive pleading due to vacation schedules and the need to confirm certain allegations with third parties. *See Exhibit A.*
5. Undersigned counsel received no response to this email.

6. On June 26, 2023, undersigned counsel again emailed Plaintiff's counsel, following up on the earlier email regarding the requested extension.

7. Undersigned counsel again received no response to this email.

8. Pursuant to Fed. R. Civ. P. 6(b)(1), this Court may, for good cause, extend the time by which a defendant must file a response to Plaintiff's Complaint.

9. As explained to Plaintiff's counsel, due to the vacation schedules of necessary ZOS representatives, and the need to confirm information related to Plaintiff's allegations with third-parties, ZOS has good cause to request a short, thirty (30) day extension, until August 4, 2023, to file its responsive pleading.

10. In accordance with Local Rule 105.9, ZOS sought but has been unable to confirm Plaintiff's consent to this request, but the requested extension will result in no prejudice to Plaintiff, as the case has just begun, and Co-Defendant AP has not yet even been served.

11. This is ZOS's first request for an extension in this matter.

Respectfully submitted,

/s/ Stephanie K. Baron

Stephanie K. Baron (Fed. Bar No. 27417)

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Attorneys for Defendant

ZeniMax Online Studios, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of June 2023, a copy of the foregoing Motion was served on all counsel of record, electronically, via this Court's electronic filing system.

/s/ Stephanie K. Baron
Stephanie K. Baron